

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

NICHOLAS BOLLETINO,

Plaintiff,

v.

CELLULAR SALES OF KNOXVILLE, INC.,
et al.

Defendants.

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: COLLECTIVE ACTION
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: NO. 3:12-cv-00138
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JOINT MOTION TO STAY LITIGATION PENDING MEDIATION

The parties jointly move this Court for an order staying the litigation of Plaintiffs' claims for sixty (60) days, pending the parties' efforts to resolve this litigation through mediation. The parties have engaged in preliminary settlement discussions and have retained Hunter R. Hughes of Rogers & Hardin LLP in Atlanta, Georgia to mediate this matter on September 3, 2013. Mr. Hughes is an experienced mediator in wage and hour collective and class action litigation.

In order to give the parties an opportunity to fully explore settlement, the parties move this Court for an order staying this litigation until the completion of this mediation on September 3, 2013. Upon the conclusion of their mediation, the parties will inform the Court as to whether the mediation resulted in the settlement of Plaintiffs' claims, subject to this Court's approval. Accordingly, the parties will inform the Court as to the status of their settlement discussions prior to the Court's September 9, 2013 hearing on Defendants' Supplemental Motion to Dismiss and Compel Arbitration. Doc. No. 189.

Date: August 17, 2013

Respectfully submitted,

/s/ David W. Garrison

George E. Barrett, Esq. (BPR # 2672)
David W. Garrison, Esq. (BPR # 24968)
Scott P. Tift, Esq. (BPR # 27592)
Seth M. Hyatt, Esq. (BPR # 31171)
Barrett Johnston LLC
217 Second Avenue
Nashville, TN 37201
Phone: (615) 244-2202
gbarrett@barrettjohnston.com
dgarrison@barrettjohnston.com
stift@barrettjohnston.com
shyatt@barrettjohnson.com

Peter Winebrake, Esq. (*pro hac vice admission*)
R. Andrew Santillo, Esq. (*pro hac vice admission*)
Mark J. Gottesfeld, Esq. (*pro hac vice admission*)
Winebrake & Santillo, LLC
715 Twining Road, Suite 211
Dresher, PA 19025
Phone: (215) 884-2491
pwinebrake@winebrakelaw.com
asantillo@winebrakelaw.com
mgottesfeld@winebrakelaw.com

Robert E. DeRose, Esq. (*pro hac vice admission*)
Barkan Meizlish Handelman Goodin DeRose Wentz, LLP
250 E. Broad Street, 10th Floor
Columbus, OH 43215
Phone: (614) 221-4221
bderose@barkanmeizlish.com

Attorneys for Plaintiff

/s/ C. Larry Carbo, III

C. Larry Carbo, III.
Ryan Cantrell
CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS
& AUGHTRY
1200 Smith Street, Suite 1400
Houston, Texas 77002
(713) 654-9630
(713) 658-2553 [fax]
larry.carbo@chamberlainlaw.com

ryan.cantrell@chamberlainlaw.com

Daniel F. McGehee
R. Deno Cole
MCGEHEE & COLE, P.C.
The Stuart, Suite One
709 Market Street
Knoxville, Tennessee 37902
(865) 523-9191
(865) 523-9219 [fax]
danielmcgehee@knoxtnlaw.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Joint Motion to Stay Litigation Pending Mediation* has been served on the following via the Court's ECF filing system on this the 17th day of August, 2013:

Daniel F. McGehee
R. Deno Cole
MCGEHEE & COLE, P.C.
The Stuart, Suite One
709 Market Street
Knoxville, Tennessee 37902
(865) 523-9191
(865) 523-9219 [fax]
danielmcgehee@knoxtnlaw.com

C. Larry Carbo, III.
Ryan Cantrell
CHAMBERLAIN, HRDLICKA, WHITE, WILLIAMS
& AUGHTRY
1200 Smith Street, Suite 1400
Houston, Texas 77002
(713) 654-9630
(713) 658-2553 [fax]
larry.carbo@chamberlainlaw.com
ryan.cantrell@chamberlainlaw.com

Counsel for Defendants

/s/ David W. Garrison
DAVID W. GARRISON
BARRETT JOHNSTON, LLC